JAN 26 1995

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Amendment of Section 73.202 (b)	)	Docket No._____
Table of Assignments,	)	RM_____
FM Broadcast Stations	)	
Pall Mall, Tennessee	)	DOCKET FILE COPY ORIGINAL
	)	

To: Chief, Policy and Rules Division

PETITION FOR RULEMAKING

Russ H. Castle, (hereinafter "Petitioner"), pursuant to section 1.401 of the Commision's rules, respectfully petitions the Commission to institute a rulemaking proceeding looking toward the assignment of FM Channel 255A to Pall Mall, Tennessee, and amend Section 73.202(b) of the Commission's Rules as follows:

City	Channel Number	
	Present	Proposed
Pall Mall, Tennessee	-0-	255A

In support whereof the following is shown:

1. As reflected in the attached technical exhibit, prepared by Sisk Engineering Inc., the requested assignment of FM Channel 255A at Pall Mall, Tennessee, can made in full compliance with all applicable minimum mileage separations and other technical requirements under the Commission's Rules. Further, Channel 255A can be assigned to Pall Mall, Tennessee, without any other changes in the Table of Assignments.

2. It is the long standing policy of the Commission as mandated by Congress to allow the most efficient use of available spectrum in order to advance the public interest, convenience, and necessity. There is no FM broadcast facility currently licensed to Pall Mall,Tennessee. Therefore, it adopted this proposal would provide first local service to the community of Pall Mall, Tennessee.

3. As can be ascertained from the attached declaration, if Channel 255A is allocated to Pall Mall, Tennessee, petitioner will promptly apply for a construction permit for the new FM broadcast station, and if a construction permit is granted, petitioner will promptly construct and operate the station for which it is licensed.

WHEREFORE, for the foregoing reasons, the Commission should amend Section 73.202(b) of its Rules by allocating FM Channel 255A to Pall Mall, Tennessee.

Respectfully Submitted,

Russ H. Castle
Petitioner

1/25/95

Russ H. Castle
1006 Melrose Drive
Cookeville, Tn. 38501

ENGINEERING STATEMENT FOR Russ H. Castle

INTRODUCTION:

This Engineering Statement has been prepared on behalf of Russ H. Castle in support of the assignment of Channel **255-A**, to Pall Mall, Tennessee. This channel can be assigned to Pall Mall, Tennessee, in full compliance with the minimum distance separation required between stations in Rule **73:207**. This assignment can be made to Pall Mall, Tennessee, without any other changes in 73:202, as amended.

ALLOCATION STUDY:

A computer allocation study has been made to determine that this channel can be utilized at Pall Mall, Tennessee. That allocation study is attached to this engineering statement as **EXHIBIT 1.** Russ H. Castle is very familiar with the area and feels that he can find a site for the antenna and transmitter in the area of the following coordinates, N. Lat. 36-30-00 W. Lng. 84-58-00. This site meets all the special requirements of the rules

concerning the assignment of **255-A** to Pall Mall ,Tennessee.

CONTOUR CONSIDERATION:

EXHIBIT 2 is a computer generated map which illustrates that this channel, operating as a **Class A**, can comply with the minimum spacing requirement of **73:207** and place a city grade contour over the town of Pall Mall, Tennessee. **EXHIBIT 3** depicts the area where the station can be located. In order to determine that a city grade contour would be provided to the town from the hypothetical coordinates, a terrain study was conducted from those coordinates and the procedure set out in the commissions rules were utilized. **EXHIBIT 4** is a tabulation of all five radials utilized in this study. These tabulations give the average elevation from 3 to 16 kilometers in meters AMSL, the effective antenna height in meters above AAT, and the distance to the 70 dBu city grade contour and the 60 dBu service grade contour. When determining the Average Elevation above the terrain, only the eight cardinal radials were utilized. The fifth radial, which is the one going through the center of Pall Mall, was not included in the average.

CONCLUSION:

Based on this information, it appears that this channel can be assigned to Pall Mall, Tennessee, as a **Class A** and comply with the commissions rules **73:207** and **73:315**. Therefore, the petitioner request the amendment of the Federal Communications Commissions Table of Assignments **73:202(b)** and assign channel **255-A** to Pall Mall, Tennessee. When this channel is assigned to Alpine, Mr. Castle will promptly apply for a construction permit to construct a Full Class **A** station at Pall Mall, Tennessee.

Sisk Engineering, Inc. assumes no liability for any errors or omissions in the information hereby provided, and shall not be liable for any injuries or damages (including consequential) which might result from use of this engineering report. Sisk Engineering, Inc. assumes no liability for this report if it is accepted or rejected by the Federal Communications Commission. The Applicant agrees with these stated terms and conditions or this report is considered null and void and is not to be utilized in any way or filed with the Federal Communications Commission.

Olvie E. Sisk
Date: DEC. 28, 1994

CERTIFICATION

I, Olvie E. Sisk, do hereby certify under penalty of perjury;

That my qualifications in telecommunications matters are a matter of record before the Federal Communications Commission having been presented and accepted upon many occasions in the past;

That I am a consultant doing business at Fulton, Mississippi, specializing in technical topics pertaining to the broadcast industry and the associated RF transmission systems;

That I have been retained by Russ H. Castle to perform certain technical studies and prepare this statement of same;

That the accompanying technical report and exhibits were prepared by me personally or under my immediate personal supervision and that all information presented therein is true and correct of my own knowledge and belief.

Olvie E. Sisk
Date: DEC. 28, 1994

KEY TO EXHIBITS

1) **Exhibit 1 Allocation Study**

2) **Exhibit 2 Contour Map**

3) **Exhibit 3 Map Showing Site Area**

4) **Exhibit 4 Distance To Contours**

GENE SISK - SISK ENGINEERING
HWY. 25 S. - RADIO BUILDING - FULTON MS 38843

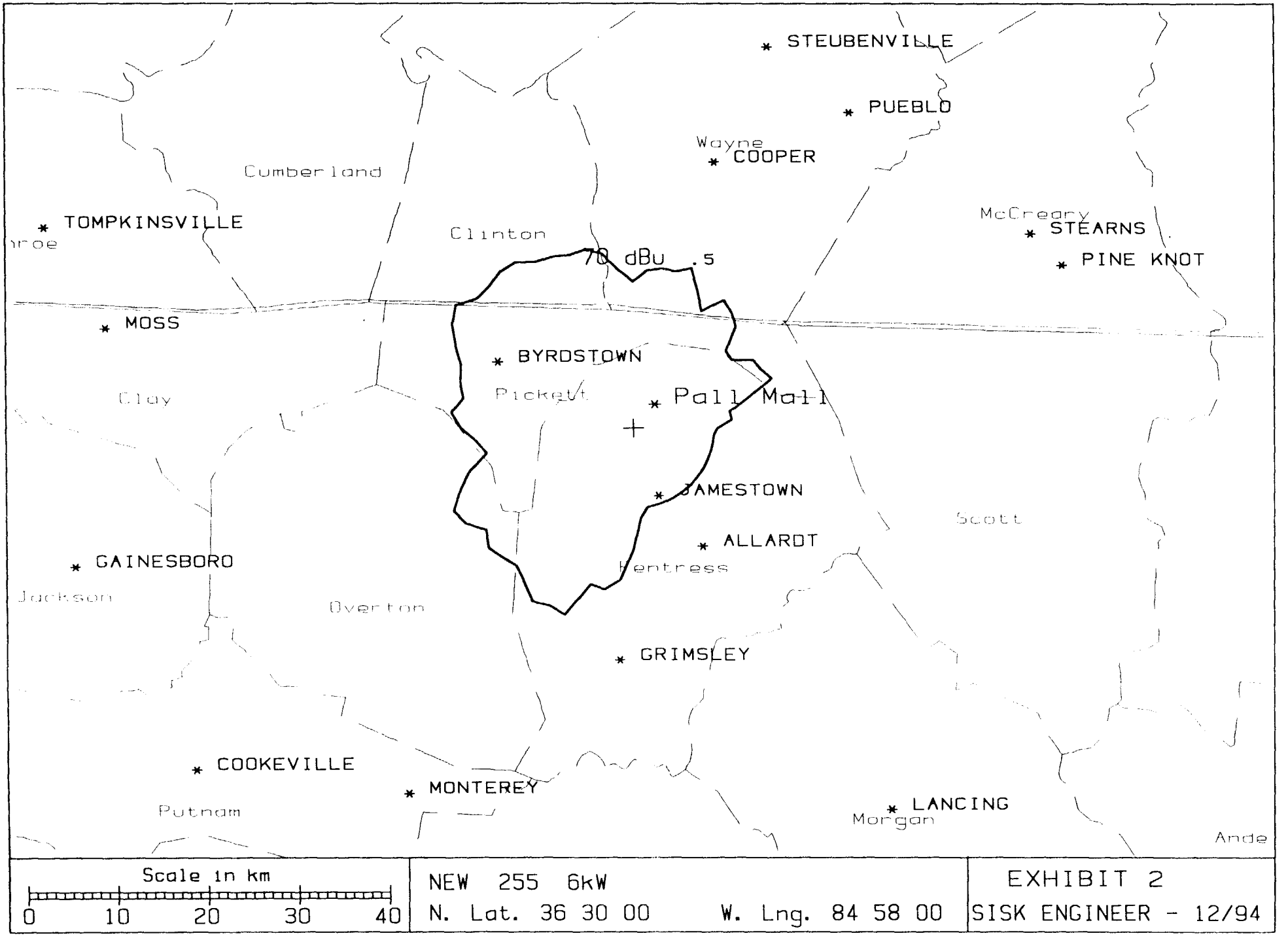
EXHIBIT 1 ALLOCATION STUDY
FOR RUSS H. CASTLE

REFERENCE
36 30 00 N
84 58 00 W

CLASS A
Current rules spacings
CHANNEL 255 - 98.9 MHz

DISPLAY DATES
DATA 11-25-94
SEARCH 12-30-94

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN	
WKDOFM	254C3	Liberty	KY	2.8	89.57	89.0	0.57	<
WXVO	254A	Oliver Springs	TN	133.9	75.94	72.0	3.94	
WHUBFM	253C2	Cookeville	TN	228.6	59.93	55.0	4.93	
WANT	255A	Lebanon	TN	254.4	121.19	115.0	6.19	
WAPC	256A	Edmonton	KY	318.1	78.45	72.0	6.45	
AD252	252A	Whitley City	KY	58.3	51.51	31.0	20.51	
WXVL.C	257A	Crossville	TN	189.9	52.38	31.0	21.38	
WNOX	256A	Loudon	TN	142.4	99.92	72.0	27.92	
WXVL	257A	Crossville	TN	185.8	61.31	31.0	30.31	
WSIPFM	255C1	Paintsville	KY	53.2	240.20	200.0	40.20	
WKDPFM	258C2	Corbin	KY	60.3	101.67	55.0	46.67	
WKJK.C	255B	Salem	IN	336.5	225.70	178.0	47.70	


STEUBENVILLE
PUEBLO
Wayne
COOPER
Cumberland
TOMPKINSVILLE
Clinton
McCreary
STEARNS
PINE KNOT
70 dBu .5
MOSS
BYRDSTOWN
Pickett
Pall Mall
Clay
JAMESTOWN
Scott
ALLARDT
GAINESBORO
Fentress
Jackson
Overton
GRIMSLEY
COOKEVILLE
MONTEREY
Putnam
LANCING
Morgan
Scale in km
0 10 20 30 40
NEW 255 6kW
N. Lat. 36 30 00 W. Lng. 84 58 00
EXHIBIT 2
SISK ENGINEER - 12/94

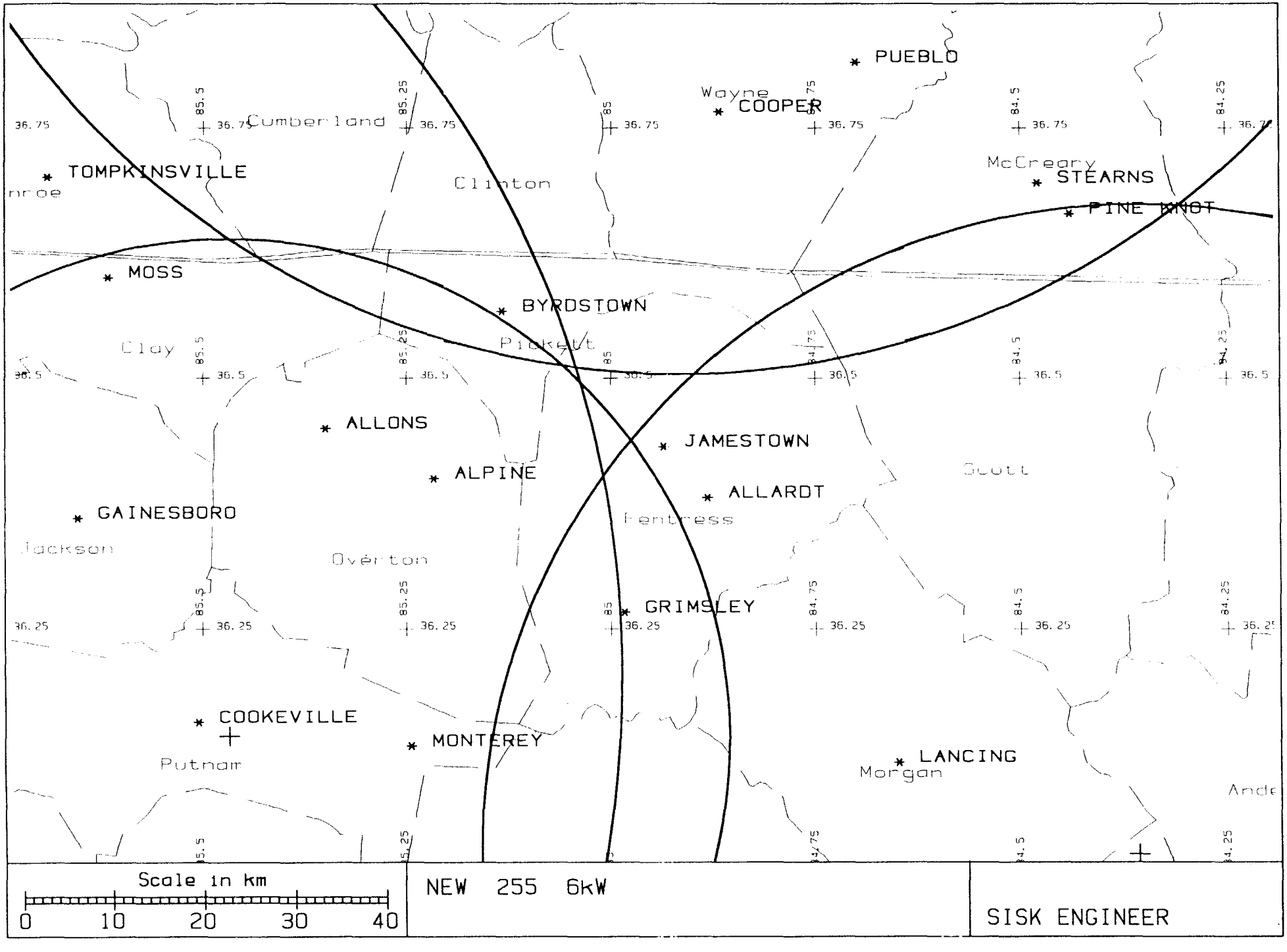


EXHIBIT 3 SITE AREA

TERRAIN AND CONTOUR DATA
EXHIBIT 4 RUSS H. CASTLE
PALL MALL TN.

ERP = 6 kW
FM - 2-6 Tables

Azimuth Deg T.	Ave. Elev. 3 to 16 km Meters AMSL	Effective Antenna Height Meters AAT	ERP (dBk)	F(50-50) Distance to 70 dBu Contour km	F(50-50) Distance to 60 dBu Contour km
0	399.8	97.0	7.782	15.9	27.9
30	413.3	83.5	7.782	14.6	26.0
60	411.1	85.7	7.782	14.8	26.3
90	469.0	27.8	7.782	8.9	15.8
120	487.7	9.1	7.782	8.9	15.8
150	513.6	-16.8	7.782	8.9	15.8
180	430.3	66.5	7.782	13.1	23.5
210	312.1	184.7	7.782	22.1	37.6
240	330.4	166.4	7.782	21.1	35.9
270	365.6	131.2	7.782	18.7	31.9
300	298.5	198.3	7.782	22.8	38.7
330	330.8	166.0	7.782	21.1	35.8
Ave. =	396.8 M	99.9 M			

Antenna Radiation Center AMSL = 496.8 M

Geographic Coordinates:

North latitude: 36 30 00
West longitude: 84 58 00